

REMARKS

The Office Action dated October 28, 2005 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto. No new matter has been added through the above amendment. Claims 1-18 are pending in the application and are again submitted for consideration.

Claims 1-18 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Sections of claim 1 were indicated as not being understood and claim 10 was rejected for what should have been indicated to have been an antecedent basis problem with limitations in that claim. Claim 10 has been amended to depend from claim 6, where its original dependence from claim 1 was in error.

With respect to the elements of claim 1 not being understood, Applicants provide clarification herein and respectfully assert that such clarifications can also be found in the instant specification. The discussions of Fig. 10, such as found, for example, at paragraphs [0075] through [0083], detail that the Packer groups packet data into cells. Thus, a portion of a packet may be packed into a cell for storage in the Packet Pool. Such a functionality is helpful in that packets can have different sizes and the packing into cells allows for a single data width to be employed with the Pool. Similarly, cells are read out of the Packet Pool and separated, if needed, so that the packet data form can be reconstructed. Therefore, Applicants respectfully assert that the language of claim 1 is

clear and definite when viewed in the context of the instant specification. It is, therefore, respectfully requested that the rejection under 35 U.S.C. §112 be withdrawn.

Claims 1-3 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Chen* (U.S. Patent No. 6,501,758) in view of *Yamamoto* (U.S. Patent No. 6,658,017). Applicants note that claims 11 and 12 were also rejected over the same combination in a separate rejection at paragraph 7 of the Office Action. Applicants respectfully traverse this rejection according to the remarks that follow.

Claim 1 recites a memory management unit for a network switch fabric for forwarding data. The memory management unit includes an ingress port interface receiving portions of a data packet, an egress port interface, connected to ingress ports of the fabric through an ingress bus ring, a cell packer, where the cell packer groups packet data into cells, a packet pool memory, where the packet pool memory stores cells received from the cell packer and a cell unpacker, where the cell unpacker separates stored cells before releasing the cells to an egress port. Claims 2-18 depend from claim 1. As will be discussed below, Applicants respectfully submit that *Chen* and *Yamamoto* fail to teach or suggest the claimed invention.

Chen is directed to a method of transporting asynchronous transfer mode cells and time-division multiplexed information over a common fiber ring. A plurality of incoming signals comprising asynchronous transfer mode cells, legacy data, or time-division multiplexed information, are received and the plurality of incoming signals are formatted into a first plurality of incoming transport signals comprising asynchronous

transfer mode cells and a second plurality of incoming transport signals comprising time-division multiplexed information and transmitting the first and second outgoing synchronous transfer mode signals over a common fiber ring.

The Office Action acknowledges that *Chen* fails to disclose a packet pool memory to store cells and thus also cites *Yamamoto*. *Yamamoto* discloses a control process that enables improved transmission efficiency. When a signal stored in a buffer is outputted by specifying a certain transmission channel, the network is adapted so that the control waits until the buffer has been brought into a state in which the signal can be outputted therefrom to the specified transmission channel. The rejection specifically cites Rings A-D in Fig. 7 tying together a plurality of nodes, each containing a pool memory.

Claim 1 recites, in part, “an egress port interface, connected to ingress ports of the fabric through an ingress bus ring.” As recited in that claim, the ingress bus ring is a part of the network switch fabric. As illustrated in Figs. 2 and 3 of the instant specification, the ingress bus ring is internal to the switch fabric and ties the ports and the memory management unit together. Additionally, all of the cell packing and unpacking, as well as the packet pool memory, reside in the switch fabric and allow for temporary storage of packet data while the packet is being handled.

In contrast, in *Chen*, the system 10 has a fiber ring 12 that connects nodes 14. Column 2, lines 33-36, discloses that the “[f]iber ring 12 may be configured as a synchronous optical network (SONET), as a synchronous digital hierarchy (SDH) network, or other optical network configuration.” Such a ring connects network switches

together is not an internal bus ring. Additionally, claim 1 recites “an ingress bus ring,” where the ring discussed in *Chen* is not specific to the ingress of any network node. It is therefore improper to consider the ring in *Chen* to be an ingress bus ring, as claimed.

Similar to *Chen*, *Yamamoto* discloses only a ring that connects node devices 701 to 704. The transmission paths between the node devices are not internal to those node devices and cannot be said to be equivalent to the egress bus ring of the present invention. Given this deficiency, Applicants respectfully assert that the rejection of claims 1-3, 11 and 12 is improper for failing to teach or suggest all of the elements of those claims. Reconsideration and withdrawal of the rejection are respectfully requested.

Claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Chen* in view of *Yamamoto* and *Bass* (U.S. Patent No. 6,862,292). Claims 7 and 8 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Chen* in view of *Yamamoto*, *Bass* and *Stilliadis* (U.S. Patent No. 6,134,217). Claim 10 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Chen* in view of *Yamamoto* and *Roy* (U.S. Patent No. 6,243,359). Claim 13 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Chen* in view of *Yamamoto* and *Haraszti* (U.S. Patent No. 5,612,964). Claims 14 and 17 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Chen* in view of *Yamamoto* and *Dai* (U.S. Patent No. 6,658,016). Applicants respectfully traverse the above rejections.

Applicants note that *Bass*, *Stilliadis*, *Roy*, *Haraszti* and *Dai* were also cited as teaching elements that were acknowledged as not being disclosed by the combination of

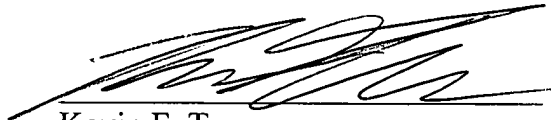
Chen and *Yamamoto*. However, none of the additionally cited references cure the deficiencies of *Chen* and *Yamamoto* discussed above. Therefore, Applicants respectfully assert that the rejections of claims 5, 7, 8, 10, 13, 14 and 17 are improper for at least the same reasons as discussed above with respect to the rejections of claims 1-3, 10 and 11. Additionally, these claims recite additional limitations which are neither disclosed nor suggested by the cited prior art.

In addition, Applicants acknowledge that claims 4, 6, 9, 15, 16 and 18 were all indicated as containing allowable subject matter. Given the impropriety of the prior art rejections, Applicants respectfully assert that claims 1-18 should be allowed and the application should be allowed to proceed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin F. Turner', written over a horizontal line.

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